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July 31, 2024

VIA ECF
Hon. Sarah Netburn, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

Re: *Arthur Balder v. Susan Sarandon, et al,* Case No.: 1:22-cv-06401-JLR-SN

Hon. Judge Netburn:

We represent Defendants Susan Sarandon, Honey Shara, David Shara and Tigran Tsitoghdzyan (collectively, "Defendants") in this action. This letter motion is submitted pursuant to Sections I(B) and (G) of Your Honor's Individual Practices in Civil Cases. We write to respectfully request that the Court stay the deadline for Plaintiff Arthur Balder ("Plaintiff") and Defendants (Plaintiff and Defendants collectively, the "Parties") to file responses to the other party's objections to the Court's December 18, 2023, Report and Recommendation, currently due August 2, 2024 (the "R&R Objection Responses").

The Parties currently have until August 2, 2024, to file the R&R Objection Responses. [Dkt. No. 145]. However, pursuant to Plaintiff's letter dated July 27, 2024 [Dkt. No. 146], Plaintiff intends to file a motion to enforce the settlement entered into the record by Plaintiff and Defendants") at the February 29, 2024, settlement conference (the "Settlement Agreement"). As such, the Parties agree that it would be a waste of judicial resources for your Honor to consider the R&R Objection Responses prior to making a decision on the Plaintiff's motion to enforce the Settlement Agreement.

For this reason, we respectfully request that the deadline for the Parties to file their R&R Objection Responses be stayed until fourteen (14) days after your Honor makes a ruling on Plaintiff's motion to enforce the Settlement Agreement. This is the second request concerning the deadline for the R&R Objection Responses. Plaintiff consents to the stay.

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We greatly appreciate your Honor's time and consideration in this matter, and should the Court need any further information we are happy to provide such and are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

Barry M. Golden Esq.

Cc. Arthur Balder (via ECF pursuant to Court Authorization)